

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

**FILED ELECTRONICALLY**

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THE GAP, INC. and GAP (APPAREL) LLC, :  
:  
Plaintiffs, : 07 Civ. 9614 (AKH)  
:  
-against- : ECF CASE  
:  
G.A.P. ADVENTURES INC., :  
:  
Defendant. : **DECLARATION OF BRUCE P.**  
:  
: **KELLER IN SUPPORT OF GAP'S**  
:  
: **MOTION IN LIMINE TO ADMIT**  
:  
: **TESTIMONY OF ANITA VOTH**  
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DEBEVOISE & PLIMPTON LLP  
919 Third Avenue  
New York, New York 10022  
(212) 909-6000  
*Attorneys for Plaintiffs The Gap  
Inc. and Gap (Apparel), LLC*

Bruce P. Keller declares:

1. I am a member of the bar of the State of New York, a member of the bar of this Court, and a member of Debevoise & Plimpton LLP, counsel to The Gap, Inc. and Gap (Apparel) LLC (“Gap”) in this matter. I submit this declaration on personal knowledge in support of Gap’s motion *in limine* to admit the testimony of Anita Voth.

2. A true and correct copy of the deposition transcript of Anita Voth, dated December 2, 2010, is attached as Exhibit 1.

3. A true and correct copy of excerpts from the deposition transcript of Bruce Poon Tip, dated January 7, 2009, is attached as Exhibit 2.

4. A true and correct copy of the Affidavit of Bruce Poon Tip, dated November 19, 2009, filed in *The Matter of an Opposition by Gap (ITM) Inc., The Gap, Inc. And Gap (Canada) Inc. to Application No. 1,286,107 for the Trade-mark G.A.P. Adventures* is attached as Exhibit 3.

5. A true and correct copy of Applicant’s Responses to Opposer’s Interrogatories 1-30, dated March 12, 2007, filed in *Gap (Apparel) LLC v. G.A.P. Adventures Inc.*, Opp. No. 91175017, is attached as Exhibit 4.

I declare under penalty of perjury that the foregoing is true and correct.

Executed at New York, New York this 27th day of April, 2011.

/s/ Bruce P. Keller  
Bruce P. Keller